

solids left on the third floor of the building after removal of the PCB-contaminated wood block floor. The PCB result from the sample collected from the third floor contained PCB levels of 24 mg/Kg. This sample was collected prior to U.S. EPA contractors scraping the third floor. A second sample, CCC-Third Floor 2, was collected from the solids that remained on the third floor after the scraping of the solids, and hand delivered to the laboratory Bureau Veritas located in Novi, Michigan for PCB analysis by SW 846 8082. The results were received on October 24, 2008, from the second sample collected of the third floor solids. The result was 26.3 mg/Kg of PCBs. U.S. EPA contractor cut a hole in the AST on site that was inaccessible. There was approximately 150 gallons of unknown liquid in the AST. U.S. EPA contractors also began removing debris from the truck ramp area in hopes to find the drums and containers left by MDEQ for disposal. One drum, containing material, was found in the truck ramp area.

During the week of October 27, 2008, U.S. EPA contractors transferred the equipment to the fifth floor, completed removal of the wood block flooring, and scraped the solids material on the fifth floor of the building. PCB ballasts and capacitors were also removed from the sixth floor of the building. U.S. EPA contractors also decommissioned the first of four ASTs on site, and removed a second AST from the tank area. A sample, CCC-Fifth Floor, was collected from the remaining dry solids on the fifth floor of the building for PCB analysis by SW 846 8082 and hand delivered to Bureau Veritas Laboratory located in Novi, Michigan. On October 29, 2008, a crane was on site to move the equipment from the fifth floor to the fourth floor of the building. The contractors removed the PCB-contaminated wood block floor from the fourth floor and stockpiled the material outside. Results were received on October 30, 2008, the PCB result for the fifth floor sample was found at 60 mg/Kg. The laboratory was requested to rerun the sample.

During the week of November 3, 2008, U.S. EPA contractors continued removing the PCB-contaminated wood block flooring from the fourth floor of the building and stockpiling the material outside. U.S. EPA contractors also continued transportation and disposal of PCB-contaminated wood block flooring and debris. Approximately 960 yd³ of PCB-contaminated wood block and debris were transported off-site for disposal. Results were received from a re-analysis of the dry solids sample collected from the fifth floor of the building. The result of the sample re-run was 8.9 mg/Kg PCBs. The laboratory attributes the difference in sample results to the non-homogeneity of the sample. OSC Kimble spoke to U.S. EPA Toxic Substance and Control Act (TSCA) representative Ken Zolnierczyk. Mr. Zolnierczyk stated that due to the non-homogeneity of the sample preparation from the first sample run, that the use of the analytical result from the second run of the sample is

consistent with the historical data and that it is appropriate to use the second run result as the result of the fifth floor dry solids sample for cleanup confirmation.

U.S. EPA contractors pumped out the unknown liquids from one of the ASTs into plastic totes for sampling and disposal. A representative from MDEQ and the City of Detroit was on site to conduct a general site walk through and to check on the progress of the removal action.

During the week of November 10, 2008, U.S. EPA contractors completed the scraping of the dry solids and transferred the material from the fourth floor to the staging area for disposal. U.S. EPA contractors also removed solids and decommissioned the second of four ASTs for disposal and prepared for the crane to be on site on November 11, 2008, to remove equipment from the fourth floor of the building. U.S. EPA contractors continued removing PCB-contaminated wood block flooring from the elevator shaft and any other wood block flooring that had not been removed from the first, second and third floors of the building. U.S. EPA contractors also packaged up all of the PCB ballasts and capacitors found throughout the building for disposal and began sweeping the dry solids off of the fifth floor of the building. U.S. EPA contractors decontaminated the equipment that was used to remove the PCB-contaminated wood block flooring. U.S. EPA contractors completed cutting up two of the ASTs.

During the week of November 17, 2008, U.S. EPA contractors removed wood block that had fallen into the trenches located on the first floor of the building and completed moving debris to the debris stockpile area, scraped the remaining dry solids on the first floor of the building, and removed sludge from the last two ASTs. U.S. EPA contractors stabilized acid solids found in a metal vat on site. U.S. EPA contractors also removed debris from the first floor of the building and the truck ramp area. Fourteen drum carcasses with small amounts of unknown contents were found and removed from the truck ramp area. An estimated 20,000 gallon sump area was discovered at the bottom of the truck ramp filled with an unknown liquid. On November 20, 2008, U.S. EPA contractors completed removing debris from the first floor of the building and the truck ramp area. U.S. EPA contractors also collected two liquid waste samples, one sample was from the AST liquids, CCC-Liquid, and one from the sump located in the truck ramp area, CCC-Truck ramp. Liquid samples were submitted to the laboratory for disposal analysis of Ignitability Method SW 846 1030, PCB by SW 846 Method 8082, pH by SW 846 9045C, Reactive Cyanide by SW 846 Chapter 7.3.3.2, Reactive Sulfide by SW 846 Chapter 7.3.4.2, Metals by SW 846 Method 6010B, Mercury by SW 846 Method 7470A, Volatile Organic Compounds (VOC) by SW 846 Method 8260B and Semi-Volatile Organic Compounds (SVOC) by SW 846 Method 8270C. One solid

sample from the solid wastes was also collected for disposal analysis to include Ignitability Method SW 846 Method 1030, PCBs by SW 846 Method 8082, pH by SW 846 Method 9045C, Reactive Cyanide by SW 846 Chapter 7.3.3.2, Reactive Sulfide by SW 846 Chapter 7.3.4.2, Toxicity Characteristic Leaching Procedure (TCLP) Metals by SW 846 Method 1311/6010B, TCLP Mercury by SW 846 Method 1311/7470A, TCLP VOC by SW 846 Method 1311/8260B and TCLP SVOC by SW 846 Method 1311/8270C. All three samples were hand delivered to the Bureau Veritas Laboratory located in Novi, Michigan.

During the week of November 24, 2008, U.S. EPA contractors prepared the solid waste on site for disposal, continued sweeping the remaining low level PCB-contaminated dry solids on the fifth floor of the building, and prepared the site for temporary demobilization. U.S. EPA and its contractors temporarily demobilized from the site for the holidays.

During the week of December 8, 2008, U.S. EPA contractors re-mobilized to the site. U.S. EPA contractors completed sweeping the remaining low level PCB-contaminated dry gross solids from the fifth floor of the building and began sweeping the fourth floor. U.S. EPA contractors completed pumping out unknown liquids from the pits, located near the previous location of the ASTs, into totes and continued sweeping the remaining low level PCB-contaminated gross dry solids from the fourth and third floors of the building.

During the week of December 15, 2008, U.S. EPA contractors completed sweeping the remaining low level PCB-contaminated gross dry solids on the third and second floors of the building, and completed removal of the wood block flooring from the elevator shafts. U.S. EPA contractors prepared PCB ballasts for disposal. On December 17, 2008, U.S. EPA contractor collected a water sample from the truck ramp sump area and hand delivered the sample to Environmental Quality for disposal. U.S. EPA contractors also conducted transportation and disposal of PCB-contaminated wood block flooring and debris. Approximately 160 yd³ of PCB-contaminated wood block and debris were transported off-site for disposal. One 20 yd³ roll off box filled with wood block and debris was also taken off site.

During the week of December 22, 2008, U.S. EPA contractors prepared for demobilization and conducted transportation and disposal of PCB-contaminated wood block flooring and debris. Approximately 200 yd³ of PCB-contaminated wood block and debris were transported off-site for disposal.



On January 5, 2009, U.S. EPA contractors conducted disposal of hazardous waste water, seven drums of PCB ballasts, and 12,600 gallons of non-hazardous waste water from the truck ramp area. U.S. EPA and the State conducted a final site walk.

On January 9, 2009, U.S. EPA and the City of Detroit conducted a final site walk and the property was turned over to the City of Detroit.

Air monitoring with a Personal Data Ram (PDR) was conducted during the initial non-asbestos removal site activities. During post-asbestos cleanup a PDR was not used since asbestos air samples showed asbestos level well below the NIOSH and OSHA requirements. Air samples were collected for asbestos sampling. No readings exceeded the site's action levels as described in the site-specific Health and Safety Plan. All site activities were conducted in Level C PPE. All site activities were documented in the site logbook. START took photographs of site activities (Enclosure 2) and documented the photograph information in the site logbook.

Summary

On September 17, 2008, U.S. EPA and its contractors mobilized to the site to perform a Removal Action. The contractors began by repairing the perimeter security fence and removing debris. From September 22 to September 26, 2008, the asbestos subcontractors conducted gross asbestos removal. On September 26, 2008, U.S. EPA contractors began removing PCB-containing wood block flooring throughout the building and stockpiling it on site for off site transportation and disposal. A crane was brought on site on October 1, October 7, October 16, and October 29, 2008, to move the equipment to the various floors for wood block removal. Samples were collected from the remaining solids on each floor, except the fourth floor, to determine the presence of PCBs. Disposal of the non-TSCA PCB-containing wood block flooring began on October 10, 2008. The PCB-contaminated wood block flooring was disposed of at the Carleton Farms Landfill, New Boston, Michigan. A crane was brought on site on November 11, 2008, to remove the equipment from the building after completion of all of the PCB-contaminated wood block flooring removal. On November 12, 2008, the U.S. EPA contractors began sweeping the remaining low level PCB-contaminated dry solids on the fifth floor. It was determined that all floors were going to be swept so the fourth floor was not sampled. On November 20, 2008, three disposal samples were collected for disposal analysis. The site was temporarily shut down for the holiday and to set up disposal from November 27 to December 7, 2008. On December 8, 2008, U.S. EPA contractors remobilized and continued sweeping the remaining low-level PCB-contaminated dry solids from the building.

Disposal was conducted for the wood block flooring on December 18 and December 23, 2008. U.S. EPA and its contractors demobilized on December 23, 2008, for the holidays.

On January 5, 2009, U.S. EPA and its contractors re-mobilized to the site to conduct disposal of the seven drums of PCB ballasts and capacitors, 2-300 gallon totes with hazardous waste water collected from the ASTs, and the 9,200 gallons of non-hazardous waste water located in the truck ramp area. On January 9, 2009, U.S. EPA met with the City of Detroit for a final site walk and to turn the property back over to the City of Detroit.

Conclusion

U.S. EPA had abated all threats posed by site conditions to human health and the environment by removing the 3,920 yd³ of PCB-contaminated wood block flooring and loose ACM, PCB ballasts and capacitors, and both hazardous and non-hazardous liquids from the ASTs and the truck ramp area.

If you have any questions or comments regarding this letter report, please call me at (317) 313-1136.

Sincerely,

Karen Campbell

Karen Campbell, P.E.

TN&A START Project Manager

Enclosure 1	Site Figures
Enclosure 2	Waste Disposal Table
Enclosure 3	Photographic Log

cc: Lorraine Kosik, U.S. EPA START Project Officer
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